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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

NAOMI K. TEVES-VALDEZ,
Individually and as Personal
Representative of the Estate of ERIKA J.
TEVES-VALDEZ, Deceased; MELE
HESIA, as Personal Representative of the
Estate of MATTHEW CHRISTOPHER
HAIDER; TRACY RADER, Individually
and as Personal Representative of the
Estate of PATRICK JAMES RADER,

Plaintiffs,

vs.

CROMAN CORPORATION
(CROMAN CORP.), a Foreign
Corporation; and UNITED STATES OF
AMERICA,

Defendants.

Civil No. 24-00018 MWJS-WRP
Civil No. 24-00032 MWJS-WRP
(Consolidated)

Related to
Civil No. 24-00076 MWJS-WRP
Civil No. 24-00080 MWJS-WRP
(Consolidated and Dismissed)

**STIPULATION OF DISMISSAL
WITH PREJUDICE OF ALL
CLAIMS AND ALL PARTIES AND
ORDER**

**STIPULATION OF DISMISSAL WITH PREJUDICE OF
ALL CLAIMS AND ALL PARTIES AND ORDER**

COMES NOW Plaintiffs NAOMI K. TEVES-VALDEZ, Individually and as Personal Representative of the Estate of ERIKA J. TEVES-VALDEZ, deceased, MELE HESIA as Personal Representative of the Estate of MATTHEW CHRISTOPHER HAIDER, deceased, and TRACY RADER (TOGETHER, THE “PLAINTIFFS”) and Defendants CROMAN CORPORATION (“CROMAN”) and file this stipulation of dismissal with prejudice under Fed. R. Civ. P. 41(a)(2) and pursuant to LR10.2 and respectfully request an order of dismissal as follows:

1. On November 22, 2024, the parties advised the court that they had reached an amicable settlement for the consolidated cases of: *Naomi K. Teves-Valdez, et al. v. Croman Corporation, et al.*, No. 1:24-cv-00018, filed on January 12, 2024; *Michelle Maurice v. United States of America, et al.*, No. 1:24-cv-00032, filed on January 23, 2024; and the separately consolidated cases of *Naomi K. Teves-Valdez, et al. v. Sikorsky Aircraft Corporation*, No. 1:24-cv-00076, filed on February 20, 2024, and *Michelle Maurice v. Sikorsky Aircraft Corporation, et al.*, No. 1:24-cv-00080, filed on February 20, 2024. See *Maurice*, No. 1:24-cv-00032, at Dkt. No. 54.

2. The settlement of the cases listed in this paragraph is collectively referred to as the “Settlements.” The consolidated litigations of *Teves-Valdez*,

No. 24-cv-00076, and *Maurice*, No. 24-cv-00080, were previously dismissed with prejudice on May 28, 2025.

3. Plaintiffs and Croman have now completed the terms of the Settlements.

4. Plaintiffs and Croman all agree to voluntarily dismiss this matter via stipulation pursuant to Fed. R. Civ. P. 41(a)(2). Pursuant to LR41.1:

- a) The voluntary dismissal is with prejudice to refile;
- b) Each party will bear their own fees and costs and do not ask this Court to award fees or costs;
- c) No claims or parties will remain following the dismissal.¹

5. This case is not a class action. This case does not involve a receiver, nor has any receiver been appointed.

6. Pursuant to Fed. R. Civ. P. 41(a)(2), this Court may order the requested voluntary dismissal on terms that the court considers proper. No counterclaim has been pleaded or would remain.

7. Plaintiffs have not previously dismissed any federal- or state-court suit based on or including the same claims as those presented in this case.

¹ Although the United States of America did not participate monetarily in the resolution of these matters, the releases executed Plaintiffs and Croman and this stipulation would resolve, release, waive, and dismiss any and all claims against the United States of America in this litigation, too.

8. There are no pending counterclaims and this dismissal with prejudice will fully dispose of the litigation amongst the parties. There are no remaining claims or parties in this case.

Dated: Seattle, Washington, September 9, 2025

BY: /s/ROBERT F. HEDRICK
ROBERT F. HEDRICK
HSBA # 10479

ATTORNEY FOR PLAINTIFF NAOMI K.
TEVES-VALDEZ, INDIVIDUALLY
AND AS PERSONAL REPRESENTATIVE
OF THE ESTATE OF ERIKA J. TEVES-
VALDEZ, DECEASED

Dated: Scituate, MA, September 9, 2025

BY: /s/JOHN T. O'CONNELL
JOHN T. O'CONNELL
HSBA # 10715

ATTORNEY FOR PLAINTIFF MELE
HESIA AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
MATTHEW CHRISTOPHER
HAIDER, DECEASED

Dated: Honolulu, Hawai'i, September 9, 2025

BY: /s/ROBERT MIYASHITA
ROBERT MIYASHITA
HSBA # 9509

ATTORNEY FOR PLAINTIFF TRACY
RADER

Dated: Honolulu, Hawai‘i, September 9, 2025

BY: /s/ DAVID HOFTIEZER
DAVID HOFTIEZER
HSBA 009976

ATTORNEY FOR DEFENDANT
CROMAN CORPORATION

APPROVED AND SO ORDERED



/s/ Micah W.J. Smith

Micah W.J. Smith
United States District Judge

**STIPULATION OF DISMISSAL WITH PREJUDICE OF ALL CLAIMS
AND ALL PARTIES AND ORDER, *Naomi K. Teves-Valdez, et al. v. Croman
Corporation, et al.*, No. 1:24-cv-00018- MWJS-WRP and *Michelle Maurice v.
United States of America, et al.*, No. 1:24-cv-00032-MWJS-WRP (consolidated).**